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10
11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 JEREMY JOHN HALGAT, an individual,

14 Plaintiffs,

15 vs.

16 UNITED STATES OF AMERICA, DAVID N.
17 KARPEL, individually, DOES 1 through 100;
18 and ROES 1 through 100; inclusive,

19 Defendants.

CASE NO.: 2:22-cv-00592-RFB-EJY

20 **STIPULATION TO EXTEND DEADLINE**
21 **TO RESPOND TO LVMPD'S MOTION TO**
22 **DISMISS AND JOINDER [ECF NOS. 37**
23 **AND 38]**

24 **(FIRST REQUEST)**

25 NOW COMES the Plaintiff, JEREMY HALGAT ("Plaintiff"), by and through his
26 attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendant, LAS VEGAS
27 METROPOLITAN POLICE DEPARTMENT ("LVMPD"), by and through its attorney Robert
28 Freeman, who hereby stipulate that the deadline for Plaintiff to respond to Defendant LVMPD
Motions to Dismiss and Joinder [ECF Nos. 37 and 38] be extended pursuant to Local Rule IA 6-1.

This is the first request for an extension of the deadlines. In support of this Stipulation and
Request, the parties state as follows:

1. Defendant LVMPD filed their Motions to Dismiss on October 21, 2022 [ECF Nos. 37 and 38].

2. Plaintiff's deadline to respond to the Motions to Dismiss is November 4, 2022.

3. Counsel for Halgat and the United States have conferred to attempt to resolve counsel for Plaintiffs' request to be added to the Protective Order in place in the underlying criminal case so that Plaintiff may share the criminal discovery with undersigned counsel. The discovery is necessary to further plead the complaint in this case in response to arguments made in the currently pending motions.

4. Counsel for Plaintiff has also conferred with the local U.S. Attorneys' office regarding the same. Counsel have determined that a motion will be necessary to allow counsel for Plaintiff to be added to the Protective Order in the underlying criminal case so that discovery may be reviewed by counsel for Plaintiff and used to further plead the complaint in this case. It is also undersigned counsel's understanding that the United States has no objection to Plaintiff's counsel being added to the protective order upon further motion and order of this court.

5. To allow this motion to be filed and allow counsel to review the underlying criminal discovery for purposes of prosecuting this civil case and further respond to the pending Motions to Dismiss, the parties have stipulated to extend Plaintiff's response deadline to December 6, 2022. The parties have further stipulated to allow Defendants USA and Karpel until January 6, 2023 to file their responses to Plaintiff's filing.

6. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely to allow sufficient time to allow Plaintiff's counsel to be added to the protective Order in the underlying criminal case, review the criminal discovery, and respond to the LVMPD's Motion to Dismiss and Joinder.

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1 WHEREFORE, the parties respectfully request that the Court extend the deadlines as stipulated
2 to herein.

3 DATED this 4th day of November, 2022.

DATED this 4th day of November, 2022.

4 LEWIS BRISBOIS BISGAARD & SMITH LLP

MELANIE HILL LAW PLLC

5
6 /s/ Robert Freeman

7 ROBERT FREEMAN

8 Nevada Bar No. 3062

9 E. MATTHEW FREEMAN

10 Nevada Bar No 14198

11 6385 S. Rainbow Blvd., Suite 600

12 Las Vegas, Nevada 89118

13 *Attorneys for Defendant Las Vegas*

14 *Metropolitan Police Department*

/s/ Melanie A. Hill

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Attorneys for Plaintiff Jeremy John Halgat

15 **ORDER**

16 **IT IS SO ORDERED.**

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18 DATE

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 7th day of November, 2022.